

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
 Technical Requirements to Enable Blocking)
 of Video Programming based on Program) ET Docket No. 97-206
 Ratings)
)
 Implementation of Sections 551(c), (d) and)
 (e) of the Telecommunications Act of 1996)

REPLY COMMENTS OF AMERITECH

Ameritech New Media, Inc. ("Ameritech")¹, hereby replies to the comments filed on November 24, 1997, with respect to the Commission's Notice of Proposed Rulemaking ("NPRM") in the above captioned proceeding.²

In the NPRM the Commission has proposed to require cable television systems, and other distributors of video programming, to retransmit, without deletion or modification, ratings information carried in line 21 of the vertical blanking interval ("VBI") of video programming. The Commission's proposal to use line 21 has broad support among the various industry and consumer groups filing comments in this proceeding. As a cable television operator, Ameritech also has no objection to complying with the Commission's requirement.

Several commenters expressed concern, however, that the Commission might "mandate" the use of alternative blocking technologies not based on line 21 transmission

¹Ameritech New Media, Inc. is a subsidiary of Ameritech Corp. It began providing competitive cable service to customers in May 1996 and currently has franchises in 63 communities in the Chicago, Detroit, Cleveland, and Columbus area markets.

²*Technical Requirements to Enable Blocking of Video Programming Based on Program Ratings*, ET Dkt. No. 97-206, FCC 97-340 (released Sept. 26, 1997) ("NPRM").

of ratings information.³ Ameritech shares this concern. Ameritech can currently "pass through" intact closed captioning information imbedded in line 21 of a broadcast television signal, and does not foresee any additional technical difficulties with the pass-through of program ratings information in line 21. Use of a blocking technology based on radio frequency ("RF") spectrum other than line 21 of the VBI would burden Ameritech -- and indeed all other video programming distributors -- with needless, unforeseen financial and operational compliance issues.

While it is possible for rating information to be carried in other RF spectrum within, or even outside, the television band, none of the comments has demonstrated a need to do so. The VBI has a data rate capacity of 9.6 Kbps which permits a potential of at least 1200 characters to be carried in field 2 of line 21. This capacity should be more than adequate to enable the use of multiple rating systems as proposed by the Commission based on EIA Standard EIA-744. For this reason, Ameritech urges the Commission to require transmission of program rating information only within line 21 and to limit the number of potential multiple ratings systems to those that can be reasonably accommodated on line 21.

Ameritech also opposes the suggestion made by IPPV Enterprises that cable operators develop devices to transcode the line 21 rating information as it is transmitted to existing set-top decoder boxes which contain embedded parental control functions.⁴

³Wireless Cable Association at 1-3; Consumer Electronics Manufacturers Association ("CEMA") at 13-15; Information Technology Industry Council at 6-8.

⁴IPPV Enterprises at 6.

Extending program blocking requirements to existing set-top boxes would impose unnecessary financial and operational burdens on cable operators. Transcoding is a real time process involving the retranslation of one ratings system into another. To enable transcoding, a cable operator would have to modify its system at the headend by adding a VBI insertion box and other hardware. Such costly modifications are unnecessary in light of the existing capability for cable operators to pass through program ratings information carried over-the-air on broadcast television signals.

Finally, Ameritech urges the Commission to delay adoption of program blocking rules for digital television ("DTV") technology. The electronics manufacturers as an industry unanimously expressed their concern with meeting the rigorous implementation deadlines proposed by the Commission for DTV.⁵ Ameritech concurs in the view that until the industry-led process of developing a standard for the transmission of program ratings information in digital receivers is concluded, it would be premature for the Commission to consider technical rules for program blocking in DTV receivers.⁶ Accordingly, Ameritech recommends that the Commission implement a separate Notice of Proposed Rulemaking to consider rules for implementing program blocking in DTV receivers.

⁵See *e.g.*, CEMA at 7-8; Thomson Consumer Electronics at 28-33.

⁶Comments of Phillips Electronics North America Corp. at 20.

For the reasons set forth above, Ameritech supports the adoption of rules, consistent with these Reply Comments, requiring cable television operators to retransmit video program ratings information using line 21 of the vertical blanking interval.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Deborah H. Morris".

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December 18, 1997

CERTIFICATE OF SERVICE

I, Edith Smith, do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 18th day of December, 1997.

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